

# **EXHIBIT H**

	A	B	J	K	R	S
1	INVALIDITY ANALYSIS OF JOHNSON ET AL. U.S. PATENTS 6,023,683, 6,055,516, AND 6,505,172					
2	Citations to references are exemplary only and not intended to be exhaustive.					
3	A cell with tan shading indicated content obtained from another cell					
4	A cell with light green shading indicates a claim element that is anticipated by the reference in its column (possibly also asserted to be obvious)					
5	A cell with light yellow shading indicates a claim element that is not asserted to be anticipated by the reference in its column but is obvious					
6	A cell with light blue shading indicates a claim as a whole that is invalid for reasons other than					
7	\$102 or \$103. A cell with gray shading indicates matter appearing in Lawson interrogatory responses but not adopted by Dr. Shamos.					
8	A cell with rose shading indicates an element or step that is not found in the reference					
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	<b>ASSERTED CLAIMS</b>	<b>DEPEN DENCY</b>				
11						
12					J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13						
14	*172 Patent					

A	B	J	K	R	S
11	DEPEN DENCY				
12		P.O. WRITER (per interrogatory responses and L0126506)	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
13	1P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.	J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors
			Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).		(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder" is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."
			Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731		Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).
					Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080
15		P.O. Writer system renders claim 1 obvious when combined with the Fisher RIMS system, Doyle, J-CON, or the IBM TV/2 system.	Claim 1 is anticipated by P.O. Writer.	J-CON renders claim 1 obvious when combined with the Fisher RIMS system, Doyle, P.O. Writer, SABRE, the Gateway system, or the IBM TV 12 system.	"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142
16					Claim 1 is anticipated by J-CON.

11	A	B	J	K	R	S
12	ASSERTED CLAIMS	DEPENDENCY	P.O. WRITER (per interrogatory responses and L0126552 & L0126661-62).	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13	a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately	1a	<p>P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 &amp; L0126661-62).</p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor.</p> <p>(SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>	<p>To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.</p> <p>P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.</p> <p>The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.</p> <p>Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575</p>		<p>To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by J-CON and Lawson's prior art system.</p> <p>J-CON maintained a database of items. "J-CON's Point-of-Sale/total Recall uses the latest Relational Database (RDB) technology so that even the most inexperienced counterperson can quickly and accurately enter sales and print tickets." L0123449. Different portions of the database could be searched separately.</p> <p>J-CON's database contained products of multiple vendors. L0123693</p> <p>J-CON also maintained a PartFinder database. L0123658</p> <p>J-CON further made use of a PartSource database: "PartSource is a licensed product from CCI that uses Relational Database (RDB) technology to give you price sheet prices and the correct selling price for parts that are not in your JIF." L0123472.</p>
17	means for entering product information that at least partially describes at least one desired item	1b	<p>The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p>	<p>The function is disclosed in the reference. See, e.g., L0126944, which has the user entering "CAR" as a partial description of an item.</p> <p>Fields of product information are entered via a catalog screen (user interface): "The FILE DISPLAY screen appears. The ITEM MASTER FILE can be displayed in ITEM NUMBER sequence. DESCRIPTION sequence, or in COMMODITY CODE sequence. Move the cursor to the item Description sort and display all items whose description begins with the letter C, as shown below." L0126557. The first letter of the description at least partially describes at least one desired item, as does the item number or commodity code.</p> <p>The display of information is performed by a software module that provides product information describing one of more items.</p>	<p>J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).</p>	<p>J-CON discloses a means for entering product information that at least partially describes at least one desired item. Line items (desired items) are partially described on a display screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.</p> <p>The "user interface" is the display screen.</p> <p>In PartSource, items can be partially described via wildcards: "With PartSource you can use wild" cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.</p>
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11	A	B	J	K	R	S
12	ASSERTED CLAIMS	DEPEN DENCY				Shamos opinion re J-CON
13	means for searching for matching items that match the entered product information in the selected portions of the database	1c	<p>P.O. WRITER enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 &amp; L0127528).</p> <p>The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p>	<p>The reference discloses a search program, described, e.g., at L0126941-51.</p> <p>The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown, e.g., at L0126946.</p> <p>A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723</p> <p>P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.</p>	J-CON (per supplemental invalidity defenses)	The reference discloses a means for searching for search results (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911.
23						A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947
24	means for generating an order list that includes at least one matching item selected by said means for searching	1d	<p>P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).</p> <p>Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)</p>	<p>In response to a search, P.O. Writer returns a list from which items can be selected.</p> <p>Search results are selected by assigning them non-zero quantities and a list of desired catalog items is generated. L0126948. See also Fig. 19-7, "Selecting/Items From The Catalogue."</p>	J-CON created list of parts meeting a specific criteria in which a user could select parts and quantities to purchase. (L0123603 & L0123610-11).	<p>The reference discloses a means for generating a list of desired catalog items that includes at least one search result selected by said means for searching</p> <p>Desired items returned by the search program are selected for inclusion in an order list as described at L0124915: "You select a part by entering its selection number at the SELECTION field. PART-FINDER then displays the number on vehicle for the part at the QUANTITY field. If you want to sell the quantity displayed, you press &lt;RETURN&gt;. Otherwise, you can enter a different quantity."</p> <p>(3) An order list of selected items and cost data is shown at L0124916.</p> <p>The user interface is a screen that displays the SELECTION field</p>
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	A	B	J	K	R	S
11	<b>ASSERTED CLAIMS</b>	<b>DEPENDENCY</b>				Sharnos opinion re J-CON
12			P.O. WRITER (per interrogatory responses and to be selected for requisition by pressing F7. (L0126948).	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	
13		1e	P.O. Writer enabled items from the catalog screen to be selected for requisition by pressing F7. (L0126948).	<p>The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.</p> <p>A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.</p>	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	<p>The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.</p> <p>The reference discloses transferring data relating to selected matching items included on an order list to a requisition module: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919. The ticket causes a purchase order for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797. The ticket is the requisition.</p> <p>The requisition module has access to data in the database: "PartFinder is J-CONs electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts customer wants and put them on the ticket." L0123601</p>
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		1f	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	<p>The reference discloses a purchase order generation module operating on a computer system having access to the requisition.</p> <p>The user causes a purchase order to be generated from a requisition at least when the user enter "p" or "u" as described at L0127535 to transmit the requisition to Purchasing.</p> <p>P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976.</p> <p>"Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.</p>	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	<p>The reference discloses a means for processing a requisition to generate purchase orders for requisition items.</p> <p>A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g. "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693</p> <p>The module has access to the requisition (ticket): "When you compute PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123696</p>
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33	'516 Patent					

	A	B	J	K	R	S
11	1. An electronic sourcing system comprising:	DEPEN DENCY				Shamos opinion re J-CON
12						
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34		1P	P.O. WRITER (per interrogatory responses and L0126506)	P.O. WRITER is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.  Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).  Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731	J-CON (per supplemental invalidity defenses)  J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors  (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder" is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."  Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).  Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L."  multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080  "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142
35			P.O. Writer anticipates claim 1.	Claim 1 is anticipated by P.O. Writer.	J-CON renders claim 1 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.  Additionally, J-CON renders claim 1 obvious when combined with Doyle and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.  Additionally, J-CON renders claim 1 obvious when combined with the IBM TV/2 system and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	Claim 1 is anticipated by J-CON.
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A	B	J	K	R	S
11	DEPEN DENCY				Shamos opinion re J-CON
12		P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	
13	1a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.		The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.
		As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.		"PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.
			P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.		Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.
			The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.		
			Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575		
37	1b	P.O. Writer associated a collection of catalogs with CATALOGUE IDs. (L0127525).	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. L0127525.		To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.
		As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)			If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.
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A	B	J	K	R	S
ASSERTED CLAIMS	DEPENDENCY				
11			P.O. WRITER (per interrogatory responses and	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
12					
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	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPEN DENCY				
11			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
12						
13	a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	1e	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525).	A search engine (program) is described at L0126941-51 in relation to creating a purchase order by searching a catalog. For example, on page L0126944 the user enters "CAR" as a search criterion.  The search engine confines its search to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528.	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.  "Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer." L0123623.  See also '172 1c.
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	2. An electronic sourcing system as recited in claim 1, wherein catalogs comprising said collection of catalogs are stored in separate databases.		P.O. Writer renders claim 2 obvious when combined with the Fisher RIMS system or King.	Each catalogue in P.O. Writer had a separate catalog ID and can be considered a separate database.  "In this example the catalogue is composed of all items for Best Buy Supply. Another method for organizing catalogue may be by item classification or commodity. For example CATALOGUE ID could be set up called STATIONERY. This catalogue would contain all stationery items regardless of what vendor they are purchased from." L0126946  Claim 2 is anticipated by P.O. Writer.	J-CON renders claim 2 obvious when combined with the Fisher RIMS system or King.  Additionally, J-CON renders claim 2 obvious when combined with P.O. Writer and the Fisher RIMS system or King.  Additionally, J-CON renders claim 2 obvious when combined with SABRE and the Fisher RIMS system or King.  Additionally, J-CON renders claim 2 obvious when combined with the Gateway system and the Fisher RIMS system or King.	To the extent Plaintiff contends that Lawson's accused system meets this limitation, so does J-CON and Lawson's prior art system.  In my opinion, this limitation is not disclosed in the reference, but it would have been obvious to store catalogs of different vendors in separate databases because the catalogs originate from different vendors and would not be provided in the same format.  Claim 2 is anticipated by J-CON based on Plaintiff's infringement contentions. Claim 2 is obvious in view of J-CON.
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	6. An electronic sourcing system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of a catalog number and item textual information.		P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525).  P.O. Writer anticipates claim 6.	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.  Claim 6 is anticipated by P.O. Writer under all proposed constructions.	J-CON enabled a user to enter part numbers as a basis for searching the database for desired items. (L0123625).  J-CON system renders claim 6 obvious when combined with the other cited prior art references as described with respect to claim 1.	J-CON enabled a user to search by part number (catalog number). L0123625. J-CON also enabled searching by textual description: "At the SEARCH FOR field you can enter the first letter or letters of the part you want. For example, to see what subgroup spark plugs are in you can enter the first letter or letters of the part you want. For example to see what subgroup spark plugs are in you can enter "S". PART-FINDER displays all parts beginning with that letter or as many as will fit on the screen." L0124925.  Claim 6 is anticipated by J-CON.
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ASSERTED CLAIMS	DEPEN DENCY				
11					
12		P.O. WRITER (per interrogatory responses and L0126506)	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13	9P	9. An electronic sourcing system comprising:	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.  Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).  Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731	J-CON is an electronic sourcing system. (L0123423).  J-CON is an electronic sourcing system. (L0123423).  (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."  Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).  Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L."  multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080  "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142	
49			Claim 9 is anticipated by P.O. Writer.	J-CON renders claim 9 obvious when combined with the Fisher system, King or SABRE.	Claim 9 is anticipated by J-CON.
50		P.O. Writer renders claim 9 obvious when combined with the Fisher system, King, or the SABRE system			

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	ASSERTED CLAIMS	DEPENDENCY			J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
11						
12						
13						
	a collection of catalogs of items stored in an electronic format;	9a	<p>P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 &amp; L0126661-62).</p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>	<p>To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.</p> <p>P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.</p> <p>The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.</p> <p>Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575</p>		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
51						
	a first identification code associated with a first item in a first catalog;	9b	<p>P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 &amp; L0127528).</p> <p>The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p>	<p>P.O. Writer enabled a user to search for matching items among product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 &amp; L0127528).</p> <p>The catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) Therefore, a first identification code is associated with a first item in a first catalog.</p>		<p>Items in J-CON can be identified by codes, such as manufacturer's code (L0123450) or part number (L0123456).</p>
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	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPEN DENCY				
11			P.O. WRITER (per interrogatory responses and	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
12						
13	a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.	9c	Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)	This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless.		"InterChange is J-CONs electronic cross-reference for parts. You begin InterChange by pressing InterChange from any field on the POS screen except WRKSTAT or from PartFinder." L0123450.  "If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts). InterChange can find an InterChange part even if you do not know the manufacturer or the complete part number of the competitive part." L0123601.  "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621.  "InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L0123628.
56						J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.
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	A	B	J	K	R	S
11	ASSERTED CLAIMS	DEPEN DENCY				
12			P.O. WRITER (per interrogatory responses and L0126506)	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13		21P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.	J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors
	21. An electronic sourcing system comprising:			Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).		(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."
				Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731		Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).
60			P.O. Writer renders claim 21 obvious when combined with the Fisher RIMS system.		J-CON renders claim 21 obvious when combined with the Fisher RIMS system or the IBM TV/2 system.	Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L." multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080
			Additionally, P.O. Writer renders claim 21 obvious when combined with the J-CON system and the Fisher RIMS system or the IBM TV 12 system.			"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142
61	a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	21a	Items can be searched for by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	P.O. Writer's requisition module is the subject of an entire manual, L0127505-601. To the extent the claim requires a "requisition module" to generate criteria for searching, such a function is performed by the P.O. Writer search module using partial criteria as described in connection with '172 1c.	J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	In PartSource, items can be partially described via wildcards in data fields: "With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.
62			To the extent ePlus accuses Lawson's system of possessing this element, the reference also discloses the element.			See also '172 1b.

	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPENDENCY				
11			P.O. WRITER (per interrogatory responses and	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
12		21b	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.		The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.
13	a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format,		As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.  P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.  The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.  Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575		"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.  Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.
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	a catalog selection criteria used to select less than said entire collection,	21c	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944-46). The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522.	The J-CON system enabled a user to enter part numbers as a basis for searching the database for desired items and the results would display additional information. (L0123625).	To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.  Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.  See also '516 1d.
66						



A	B	J	K	R	S
ASSERTED CLAIMS	DEPEN DENCY				Shamos opinion re J-CON
11					
12					
13	21d	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).	To the extent meaning can be ascribed to this limitation, the search screen at L0127527 generates additional search-module criteria for data fields, e.g. "BEGINS WITH."	J-CON (per supplemental invalidity defenses)	To the extent meaning can be ascribed to this limitation, the search described at L0123609 discloses generation of additional search criteria: "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whenever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name."
69	21e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	"The P.O. WRITER PLUS Requisitioning Interface allows the Purchasing Department to convert requisitions into Purchase Orders quickly and efficiently." L0126966. Requisitions can be split into separate purchase orders: "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966	J-CON generated multiple purchase orders from a single requisition in a number of different ways. (L013617).	J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423.  "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693.  Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."
70		a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria;			



	A	B	J	K	R	S
	<b>ASSERTED CLAIMS</b>	<b>DEPENDENCY</b>		Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
11						
12						
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	wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	21f		This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless.		InterChange provides the capability to find multiple sources for generally equivalent items: "J-CON uses the manufacturer conversion tables during purchasing receiving automatic part maintenance and store-to-store inquiries. The tables can convert manufacturer codes to store numbers and price codes." L0124150.  "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start an InterChange from POS or from PartFinder." L0123621. "To find an InterChange for a part the first step is to enter the part number in the COMPETITIVE PART field. The competitive part is the part for which you want to find an equivalent part." L0123622.
71						
	wherein said multiple sources is limited by said catalog searching module providing a match according to said user-generated criteria, said search-module criteria and a determination system that located items are generally equivalent; and	21g		To the extent ePlus accuses Lawson's system of possessing this element, the reference also discloses the element.  This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system."	The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).	Determination: "InterChange has a self-reference feature which is helpful to the novice counterpart person who might look for an InterChange part for a line you carry. If an InterChange part is not found for the competitive part entered, InterChange checks to see you carry the competitive part." L0123628.
74						
	wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.	21h		To the extent ePlus contends that Lawson's present system meets this limitation, i.e., that linking equivalent items comprises a "determination system," the reference and Lawson's prior art system also disclose the limitation.  This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.	The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).	J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947. "Specifically you can change the manufacturer cross-reference codes so the PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides you with the part information you want using default manufacturer codes. However your manufacturer codes may not always match the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965
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A	B	J	K	R	S
11	DEPEN DENCY				
12		P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13					<p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601. "[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.</p> <p>This limitation has no ascertainable meaning. Nevertheless, parts that are equivalent in the J-CON system are identical unless they are identified as an alternate or replacement part. "When you enter replaced part and the quantity available is larger than the quantity ordered, J-CON displays the replacement part in the miscellaneous information section of the POS screen." L0123485.</p> <p>To the extent Plaintiff alleges this claim to be infringed by Lawson's current system, claim 22 is anticipated by J-CON.</p>
77	<p>22. An electronic sourcing system as recited in claim 21, wherein said determination system includes an identical identification code for each of said located items.</p>	<p>P.O. Writer renders claim 22 obvious when combined with the Fisher RIMS system.</p> <p>Additionally, the P.O. Writer system renders claim 22 obvious when combined with J-CON and the Fisher RIMS system or the IBM TV/2 system.</p>	<p>This element appears to have no meaning. To the extent it has meaning sufficient to accuse Lawson's present system, it is also disclosed in the reference and in Lawson's prior art system.</p> <p>This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless.</p> <p>All the items have the identical identification code A1000.</p> <p>To the extent Plaintiff alleges this claim to be infringed by Lawson's current system, claim 22 is anticipated by P.O. Writer.</p>	<p>The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange, (L0123625).. The JCON system renders claim 22 obvious when combined with the Fisher RIMS system or the TV/2 system.</p>	
78	<p>29. An electronic sourcing system comprising:</p>	<p>P.O. Writer is an electronic sourcing system. (e.g. L0126506)</p>	<p>P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.</p> <p>Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).</p> <p>Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731</p>	<p>J-CON is an electronic sourcing system. (L0123423).</p>	<p>J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."</p> <p>Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).</p> <p>Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L." multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080.</p> <p>"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142</p>
79					

	A	B	J	K	R	S
	<b>ASSERTED CLAIMS</b>	<b>DEPENDENCY</b>				
11			P.O. WRITER (per interrogatory responses and	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
12			P.O. Writer renders claim 29 obvious when combined with the Fisher RIMS system, SABRE or J-CON.		J-CON renders claim 29 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE or the Gateway system.	Claim 29 is anticipated by J-CON under all proposed constructions.
13					Additionally, J-CON renders claim 29 obvious when combined with the IBM TV/2 system and the Fisher	
80	a collection of catalogs of items stored in an electronic format;	29a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).  As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID (SAP_0803522-23.) The system may contain multiple CATALOGUE IDS. (SAP_083522.)	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.  P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.  P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.  The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.  Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575	J-CON renders claim 29 obvious when combined with the IBM TV/2 system and the Fisher	The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.  "PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.  Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.
81	a first set of pre-determined criteria associated with said collection of catalogs;	29b	P.O. Writer associated a collection of catalogs with CATALOGUE IDs. (L0127525).  As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)	If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by CATALOGUE IDs. L0127525.	To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.  If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.	
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	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPENDENCY				
11			P.O. WRITER (per interrogatory responses and	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
12						
13	a second set of pre-determined criteria associated with items from each of said catalogs;	29c	The P.O. Writer system associated items with criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).  The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525 & L0127528.	J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be." L0123609.
85	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party;	29d	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (L0126501 & L0126944-46). The system may contain multiple CATALOGUE IDs. (SAP_083522.)	P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 & L0126944-46. The system may contain multiple CATALOGUE IDs. SAP_083522.  P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless. or any other vendor you would like to select." L0126552.  The database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.	J-CON also provided for wildcard searching: "When you use wildcard and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices." L0123473.	J-CON also provided for wildcard searching: "When you use wildcard and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices." L0123473.
86						"You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.  The purpose of InterChange was to allow selection from among competitive items from multiple sources.
87						J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.

	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPEN DENCY				
11			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
12		29e	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).	A search engine (program) is described at L0126941-51 in relation to creating a purchase order by searching a catalog. For example, on page L0126944 the user enters "CAP" as a search criterion.	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.
13	a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.		The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)	The search engine confines its search to the catalogs identified by the first set of criteria, and therefore relies on those criteria. L0127525 & L0127528.		"Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer." L0123623.
89						See also '172 1c.
	a cross reference table linking a vendor item catalog number from said vendor with an item catalog number from said predetermined third party.	29f		To the extent ePlus contends that Lawson's present system meets this limitation, i.e., that linking equivalent items comprises a "determination system," the reference and Lawson's prior art system also disclose the limitation.	J-CON included a cross-reference module. (L0123450 & L0123601).	J-CON uses cross-reference tables to match identification codes "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947.
91				This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.		"Specifically you can change the manufacturer cross-reference codes so the PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides you with the part information you want using default manufacturer codes. However your manufacturer codes may not always match the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965
92						"If you have PartFinder you can add InterChange to your J-CON InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601. "[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.
94	1683 Patent					

	A	B	J	K	R	S
	<b>ASSERTED CLAIMS</b>	<b>DEPEN DENCY</b>				
11			P.O. WRITER (per interrogatory responses and	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
12			P.O. WRITER is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.	J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors
13	3. An electronic sourcing system comprising:	3P		Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial).  Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731	J-CON is an electronic sourcing system. (L0123423).	(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder" is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."  Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).  Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L." multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080  "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142
95			P.O. Writer anticipates claim 3.	P.O. Writer anticipates claim 3.	J-CON renders claim 3 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	Claim 3 is anticipated by J-CON.
96						



A	B	J	K	R	S
ASSERTED CLAIMS	DEPENDENCY				
11		P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
12	3a	P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 & L0126661-62).	To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.		The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.
13		As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)	P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.		
			P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.		"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.
			The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.		Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.
		Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575			
97	3b	P.O. Writer discloses an interface which enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 & L0126944 46).	The reference discloses a search program, described, e.g., at L0126941-51.		To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by JCON and Lawson's prior art system. Under this theory, JCON discloses a means for selecting organized collections to search.
			The search is disclosed, e.g., at L0126941-5.		
			A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID.		
			L0126944. Search results are shown, e.g., at L0126946.		
			A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723		"You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.
					The purpose of InterChange was to allow selection from among competitive items from multiple sources.
99					

	A		B		J		K		R		S	
	ASSERTED CLAIMS		DEPEN DENCY									
11					P.O. WRITER (per interrogatory responses and		Sharnos Opinion re P.O. WRITER		J-CON (per supplemental invalidity defenses)		Sharnos opinion re J-CON	
12			3c		P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).		The reference discloses a search program, described, e.g., at L0126941-51.  The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown, e.g., at L0126946.  A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723		J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).		The reference discloses a means for searching for search results (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911.	
102					P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).  Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)		The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.  A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.		J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).		The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.  The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.	
105			3d									
	means for building a requisition using data relating to selected matching items and their associated source(s);											



A	B	J	K	R	S
ASSERTED CLAIMS	DEPENDENCY				
11					Shamos opinion re J-CON
12					
13	3e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition.  The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing.  P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).  J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	The reference discloses a means for processing a requisition to generate purchase orders for requisition items.  A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693  The module has access to the requisition (ticket): "When you compute PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123693
107	3f	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element.  This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.  Cross-referenced items and identical items are shown in the table at L0126552	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.  To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate "generally equivalent" items, this limitation is also disclosed in J-CON and in Lawson's prior art system.  The reference discloses maintaining a cross-reference table (non-catalog database) or file identifying cross-referenced items: "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621. J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PARTFINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947.
109					

11	A	B	J	K	R	S
12	ASSERTED CLAIMS	DEPEN DENCY			J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13			P.O. WRITER (per interrogatory responses and L0126506)	Shamos Opinion re P.O. WRITER		<p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601.</p> <p>"[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628.</p> <p>See also '516 element 9c.</p>
110	6. An electronic sourcing system comprising:	6P	P.O. Writer is an electronic sourcing system. (e.g. L0126506)	P.O. Writer is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors. Locating items is disclosed at L0127525-30 (Requisitioning manual). Purchasing the located items is disclosed at L0126745-56 et seq. (Purchasing Tutorial). Multiple vendors are disclosed: "P.O. WRITER PLUS keeps a record of your Vendors in the VENDOR MASTER FILE." L0126731	J-CON is an electronic sourcing system. (L0123423).	<p>J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."</p> <p>Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).</p> <p>Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L." multiple vendors (by subline) enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080.</p> <p>"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142</p>
116			The P.O. Writer system anticipates claim 6.		The J-CON system anticipates claim 6.	Claim 6 is anticipated by J-CON.
117						

11	A	B	J	K	R	S
12	ASSERTED CLAIMS	DEPEN DENCY				
13			P.O. WRITER (per interrogatory responses and L0126552 & L0126661-62).	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
	a database containing data relating to items associated with at least two sources;	6a	<p>P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 &amp; L0126661-62).</p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>	<p>To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.</p> <p>P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.</p> <p>The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.</p> <p>Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575</p>	<p>The J-CON system includes a database of items from both primary and alternative manufacturers. (L0123613).</p>	<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
118	means for searching for matching items in the database;	6b	<p>P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 &amp; L0127528).</p> <p>The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p>	<p>The reference discloses a search program, described, e.g., at L0126941-51.</p> <p>The search is disclosed, e.g., at L0126941-5.</p> <p>A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown, e.g., at L0126946.</p> <p>A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723</p>	<p>J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).</p>	<p>The reference discloses a means for searching for search results (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911.</p> <p>A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947</p>
120						

	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPEN DENCY				Shamos opinion re J-CON
11			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	
12		6c	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.
13	means for building a requisition using data relating to selected matching items and their associated source(s);		Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.		The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.
122	means for processing the requisition to generate one or more purchase orders for the selected matching items; and	6d	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition.  The user causes a purchase order to be generated from a requisition at least when the user enter "p" or "u" as described at L0127535 to transmit the requisition to Purchasing.  P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	The reference discloses a means for processing a requisition to generate purchase orders for requisition items.  A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693  The module has access to the requisition (ticket): "When you compute PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123693
123						

	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPENDENCY				
11			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
12						
13	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	6e	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element.  This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.  Cross-referenced items and identical items are shown in the table at L0126552	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.  To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate "generally equivalent" items, this limitation is also disclosed in J-CON and in Lawson's prior art system.  The reference discloses maintaining a cross-reference table (non-catalog database) or file identifying cross-referenced items: "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621. J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PARTFINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947.
125						
126			The P.O. Writer system anticipates claim 26.	The reference discloses a method.  Claim 26 is anticipated by P.O. Writer, as shown below.	The J-CON system renders claim 26 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.  Additionally, the J-CON system renders claim 26 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	"If you have PartFinder you can add InterChange to your J-CON InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601.  "Type the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628.  See also '516 element 9c.  The reference discloses a method.  Claim 26 is anticipated by J-CON, as shown below.
132	26. A method comprising the steps of:	26P				

11	A ASSERTED CLAIMS	B DEPENDENCY	J	K	R	S
12			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13	maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	26a	<p>P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 &amp; L0126661-62).</p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor.</p> <p>(SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>	<p>To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.</p> <p>P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.</p> <p>The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.</p> <p>Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575</p>		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
133	selecting the product catalogs to search;	26b	<p>P.O. Writer discloses an interface which enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 &amp; L0126944 46).</p>	<p>P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 &amp; L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522.</p> <p>P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.</p> <p>See also '516 1d.</p>		<p>To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>See also '516 1d.</p>
135						



	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPEN DENCY				
11			P.O. WRITER (per interrogatory responses and	Sharnos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Sharnos opinion re J-CON
12	searching for matching items among the selected product catalogs;	26c	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).	The reference discloses a search program, described, e.g., at L0126941-51.  The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown, e.g., at L0126946.  A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609.  See also '172 1c.
137				P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. L0127525.		
138	building a requisition using data relating to selected matching items and their associated source(s);	26d	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).  Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.  A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element '1d, above and at L0127531-36.  See also '172 1e, '683 3d.	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses transferring data relating to selected matching items to a requisition program: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919.  The ticket causes a requisition for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797.  See also '172 1e, '683 3d.
140						

11	A ASSERTED CLAIMS	B DEPEN DENCY	J	K	R	S
12			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13	processing the requisition to generate one or more purchase orders for the selected matching items; and	26e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition.  The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing.  P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976. "Requisitions can be turned into Purchase Orders (or Requisitions for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966.	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).  J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423.  "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693.  Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."  See also '172 1f.	
142	determining whether a selected matching item is available in inventory.	26f	P.O. Writer included an inventory Control Module that enabled tracking of on-hand inventory balances. (L0126633).	"The Inventory Control Module allows you to track on-hand inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like." L0126633.  The Inventory Control module is the subject of an entire manual at L0126148-395.	The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).	"In POS you can check a stocking part's available quantity, stock quantity, and price levels. ... With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determining whether a matching item is in inventory are shown at L0125060. See also "Warehouse inquiry" at L0125061.  "JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT." L0123450.  "Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing <Whse Inquiry> from any field on the POS screen except WRKSTAT." L0123451. Inventory inquiry is described in detail starting at L0123541.
144	28. A method comprising the steps of:	28P	The P.O. Writer system anticipates claim 28.	The reference discloses a method.  Claim 28 is anticipated by P.O. Writer, as shown below.	The J-CON system renders claim 28 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.  Additionally, the J-CON system renders claim 28 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.  Additionally, the J-CON system renders claim 28 obvious when combined with the IBM TV/2 system and the Fisher RIMS system, Doyle, P.O. Writer, SABRE, or the Gateway system.	The reference discloses a method.  Claim 28 is anticipated by J-CON, as shown below.
146						



11	A ASSERTED CLAIMS	B DEPENDENCY	J	K	R	S
12			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13		28a	<p>P.O. Writer had an electronic database for storing multiple catalogs in electronic format. (L0127571, L0126552 &amp; L0126661-62).</p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor.</p> <p>(SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>	<p>To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by P.O. Writer and Lawson's prior art system.</p> <p>P.O. Writer maintained catalog data in an electronic database (electronic format): "Bayless Stationer publishes a catalogue of office supplies they sell. A very small portion of this catalogue has been pre-loaded in the sample data base." L0126575.</p> <p>P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.</p> <p>The P.O. Writer database could be searched by vendor number, indicating a portion to be searched separately: "Since you haven't received a response from Bayless yet, order from Best Buy: - In the Vendor Number field, type 12345 [ENTER]." L0126552.</p> <p>Catalogs were published by vendors: "Bayless Stationer publishes a catalogue of office supplies they sell." L0126575</p>		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
147	selecting the product catalogs to search;	28b	<p>P.O. Writer discloses an interface which enabled a user to select a particular product catalog to search using the CATALOGUE ID. (L0126501 &amp; L0126944 46).</p>	<p>P.O. Writer enabled a user to select a particular product catalog to search using the CATALOGUE ID (a "vendor identification code"). L0126501 &amp; L0126944-46. The system may contain multiple CATALOGUE ID'S. SAP_083522.</p> <p>P.O. Writer accommodated catalogs of multiple vendors: "You can now buy this item from Best Buy, Bayless, or any other vendor you would like to select." L0126552.</p> <p>See also '516 1d.</p>		<p>To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>See also '516 1d.</p>
149						

	A	B	J	K	R	S
	ASSERTED CLAIMS	DEPEN DENCY				Shamos opinion re J-CON
11			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	
12		28c	P.O. Writer enabled a user to search for matching items among selected product catalogs by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. (L0127525 & L0127528).	The reference discloses a search program, described, e.g., at L0126941-51.  The search is disclosed, e.g., at L0126941-5. A portion of the database matching the entered product information can be located, e.g., by specifying a CATALOGUE ID. L0126944. Search results are shown, e.g., at L0126946.  A file system is disclosed containing the information to be searched: "The 'foundation' of the P.O. WRITER PLUS system is a group of 13 files, referred to as the Master Files. They contain information about what you buy, who you buy from, who does the buying, etc. Information maintained in these files is used to create a Purchase Order." L0126723	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609.  See also '172 1c.
13			The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)			
151	building a requisition using data relating to selected matching items and their associated source(s);	28d	P.O. Writer system created a list of items resulting from a search in which a user could enter the quantity desired. (L0126557).  Items from the catalog screen can be selected for requisition by pressing F7. (L0126948)	The reference discloses building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.  A requisition module performs the following steps. While a list responsive to a search is being displayed, as shown at L0127530, the user can hit F7, which causes data relating to selected matching items to be transferred to a requisition program, which is the module that, in response to F7, creates a requisition. The data is then used to build a requisition, as described in the citations for element 1d, above and at L0127531-36.  See also '172 1e, '683 3d.	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses transferring data relating to selected matching items to a requisition program: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919.  The ticket causes a requisition for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797.  See also '172 1e, '683 3d.
154						

	A ASSERTED CLAIMS	B DEPENDENCY	J	K	R	S
11			P.O. WRITER (per interrogatory responses and	Shamos Opinion re P.O. WRITER	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
12		28e	P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. (L0126950). Requisitions including items purchased from different vendors were split into different purchase orders by vendor. (L0126976).	The reference discloses a purchase order generation module operating on a computer system having access to the requisition.	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423.
13	processing the requisition to generate one or more purchase orders for the selected matching items; and			The user causes a purchase order to be generated from a requisition at least when the user enter "P" or "U" as described at L0127535 to transmit the requisition to Purchasing.		"You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up P0 control files in Function 7.7." L0123693.
				P.O. Writer enabled a purchase order to be created from the requisition list by pressing F4. L0126950. Generating purchase orders from requisitions is also shown at L0126969. Requisitions including items purchased from different vendors were split into different purchase orders by vendor. L0126976.		Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."
156	converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	28f	During Purchase Order generation on the P.O. Writer system, the vendor listed on the requisition could be automatically converted to different vendors. (L012976-80).	"Requisitions can be turned into Purchase Orders (or Requests for Quotes) on a one-to-one basis. Requisitions can also be consolidated or split automatically." L0126966. To the extent ePlus accuses Lawson's system of possessing this element, i.e. through the use of UNSPSC codes, the reference and Lawson's prior art system also disclose the element.  This element is disclosed at L0126552, which shows a purchase order history screen listing different catalog numbers (first column) for the same item number (A1000) as listed by different vendors, e.g. Best Buy and Bayless. In order to produce this screen, P.O. Writer must possess the claimed "determination system." An example of the required table is shown on page L0126552, showing catalog numbers for items that are generally equivalent.  Cross-referenced items and identical items are shown in the table at L0126552	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	See also '172 1f.
158				"converting" and "substituting" have been construed to be synonyms. Therefore, see also '683 3f ("means for converting")		"Manufacturer conversion tables help your J-CON communicate with other computer systems that don't use the same manufacturer codes, sublines or pricing codes that you use. For example, your serving warehouse might use the manufacturer code DG for Detroit Gaskets while you use the code DET. The manufacturer conversion table converts the warehouses code to your J-CON code." L0124150.  "J-CON uses two types of conversion tables, vendor-specific and default. When communicating with another system, J-CON first looks to see if a table exists for the specific vendor and store. If there is not a vendor-specific conversion table, J-CON uses the default conversion table." L0124152.
159						J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.

A	B	J	K	R	S
ASSERTED CLAIMS	DEPEN DENCY				Shanos opinion re J-CON
11				J-CON (per supplemental invalidity defenses)	
12		P.O. WRITER (per interrogatory responses and	Shanos Opinion re P.O. WRITER		
13		P.O. Writer included an inventory Control Module that enabled tracking of on-hand inventory balances. (L0126633).	<p>"The Inventory Control Module allows you to track on-hand inventory balances capture and report usage history and automatically generate Re-order Analysis as often as you like." L0126633.</p> <p>The Inventory Control module is the subject of an entire manual at L0126148-395.</p>	<p>The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 &amp; L0123612).</p>	<p>"In POS you can check a stocking part's available quantity, stock quantity, and price levels. ... With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determining whether a matching item is in inventory are shown at L0125060. See also "Warehouse inquiry" at L0125061.</p>
					<p>"JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT." L0123450.</p> <p>"Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing &lt;Whse Inquiry&gt; from any field on the POS screen except WRKSTAT." L0123451. Inventory inquiry is described in detail starting at L0123541.</p>
165				The J-CON system renders claim 29 obvious when combined with the other cited prior art references as described with respect to claim 28.	Claim 29 is anticipated by J-CON.
166					